

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

LBC Baton Rouge LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

I. APPLICANT:

Company:

LBC Baton Rouge LLC

1725 Hwy 75 Sunshine, LA 70780

Approximate UTM coordinates are 743.856 kilometers East and 3325.579 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

LBC Baton Rouge LLC (LBC) is an existing bulk liquid storage and terminal facility that has been in operation since 1977. The facility operated under as PetroUnited Terminals, Inc. until the facility name change to LBC Baton Rouge LLC in 2001. The facility currently operates under Permit No. 1280-00025-04, issued January 01, 1996, small source permits 2563(M-1) amended September 17, 1998 and April 17, 2000, 2671 issued November 02, 2001, and 3028, issued March 24, 2006.

Sunshine Terminal operates on a contractual basis. A wide range of liquid commodities are stored on short term or long term bases, as per customer requirements. The materials stored and transported vary over time and include acids, alcohols, amines, aromatics, caustics, food grades, glycols ketones, lube oils, oxygenates, petroleum products, and various inorganic compounds. All materials are transported by ship, barge, truck, railcar, or any combination.

The terminal consists of 35 storage tanks ranging from 10,000 to 150,000 bbl capacity; 2-700 hp boilers used to heat the lines during product transfer; a marine loading dock with flare, a truck loading rack with flare, and a railcar loading operation with a flare; and 1-500 gallon gasoline tank used to fuel company owned vehicles and equipment.

The facility is located on 270 acres and has 25 employees.

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by LBC Baton Rouge LLC on October 12, 1996 and was replaced in its entirety with a revised application dated April 21, 2006, requesting a Part 70 Operating Permit. Additional information dated December 02, 2005, February 1, 2006, February 8, 2006, February 27, 2006, March 21, 2006, March 22, 2006, March 28, 2006, and April 26, 2006 was also received.

Project Description

With this initial Part 70 Operating Permit, LBC Baton Rouge, LLC is proposing to:

- (1) Consolidate Louisiana State Permit Nos. 1280-00025-04, 2563(M-1), 2671, and 3028. *1280-00025-04 is the plant-wide permit which included all of the facility's operations. 2563(M-1) is a small source permit issued to the facility to modify external floating roof tanks, Emission Point Numbers (EPNs) 150-1 and 150-2, whose roofs were in disrepair, into fixed roof storage tanks. The modified tank EPNs are now 150-1F and 150-2-F (EQT001 and EQT012, respectively). 2671 small source permit added railcar loading to the facility's loading options. A dedicated flare was included in the railcar loading project. Now the facility has the option of loading or unloading bulk liquid via marine, tank truck, or railcar. The railcar emission cap (RCL CAP) will be deleted and the entire railcar loading operations emissions will be permitted under the facility wide emissions caps. Therefore ambient air quality is not impacted nor is a PSD review triggered. 3028 permitted installation of a 110,000 bbl fixed roof storage tank which is dedicated to storing natural gas condensate.*
- (2) Incorporate the permit for a change in tank service, issued October 20, 2004, which permits storage of benzene in the following storage tanks 55-4, 55-7, 55-8, and 55-10. *These tanks meet all of the requirements for storage of Benzene, as was permitted for storage tank Nos. 55-5 (EQT025), 55-6 (EQT026), 55-9 (EQT029), 55-11 (EQT020), 55-13 (EQT021), 80-6 (EQT036), 80-7 (EQT037), 80-8 (EQT038), and 80-9 (EQT039), in permit 1280-00025-04. This change of tanks service increased the number of tanks that are available to store benzene, but does not increase the benzene throughput; nor does the facility have the capability of storing benzene in more than nine, of all the available tanks, at one time. Therefore ambient air quality is not impacted nor is a PSD review triggered.*
- (3) Add emission point, 500GT (EQT043), the 500 gallon gasoline storage tank; which was permitted under an Exemption dated April 4, 2005. *This storage tank is used for fueling company vehicles and equipment.*

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

- (4) Delete EPN 80-10. This new 80,000 bbl tank, permitted under 1280-00025-04, was dedicated to storing styrene and a variety of other materials, but has not been installed.
- (5) Reconcile this permit to their compliance plan for toxic air emissions.
 - a. Remove Tank 25-1 from permitted storage of LAC 33:III:Chapter 51 Class I and Class II Toxic Air Pollutants (TAPs). The tank is operating as a fixed roof storage tank and has not been retrofitted with an internal floating roof.
 - b. Sulfuric acid will be loaded by tank truck only. Railcar loading and marine loading will not be used to transfer sulfuric acid.
 - c. Demonstrate compliance with ambient air standards for n-Butyl Alcohol, Cumene, Ethyl Benzene, Ethylene Glycol, Glycol Ethers (Class II), n-Hexane, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Styrene, Sulfuric Acid, Toluene, Vinyl Acetate, and Xylene.
 - d. Expand the list of chemicals permitted for transfer and storage. The facility-wide VOC and TAPs emissions will not increase. (*Total VOC is capped, facility-wide, at 290.7 tons/yr; and TAPs, above their MERs, are capped so as not to violate Ambient Air Standards. The facility will document and maintain records of throughputs and emissions associated with all compounds stored and handled.*)
 - e. Remove Trichloroethylene, Trichloroethane, and gasoline from the list of chemicals permitted for "for-hire" storage and handling (transfer and loading).
- (6) Permit storage authority of liquid products throughputs through general (non-specific) identification of storage tanks of a specified size (bbls) and count (1 to 35). The liquid products include, but are not limited to, n-Butyl Alcohol, Cumene, Ethyl Benzene, Ethylene Glycol, Glycol Ethers (Class II), n-Hexane, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Styrene, Sulfuric Acid, Toluene, Vinyl Acetate, and Xylene. *Benzene and Propylene oxide are excluded from this type of general permitting, but are assigned specific tanks for storage.*
- (7) Handle Propylene oxide at temperatures no greater than 70°F to achieve a maximum true vapor pressure less than 11.1 psia at transfer and storage conditions.
- (8) Use the dedicated railcar loading flare, Rail FL-3 to receive truck loading vapors, currently controlled by dedicated flare, Truck FL-1.
- (9) Decrease railcar loading rate from 2,500 gpm to 1,000 gpm.
- (10) Avoid simultaneous loading of the same type of liquid product or products of similar composition.
- (11) Remove storage authority of TAPs in Tanks 80-1 and 80-2.

Section 5 of the Permit Application, dated April 21, 2006, lists the permitted emission rate before and after the application update (in tons per year) facility-wide in the permit. These changes are summarized in the Permitted Air Emissions Section of this document.

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

Permitted Air Emissions

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	2.1	1.31	- 0.79
SO ₂	0.09	0.092	0.00
NO _x	27.85	18.91	- 8.94
CO	54.9	61.26	+ 6.36
VOC*	290.7	290.7	0.00
Sulfuric Acid	6.21	0.91	- 5.30

*Includes VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs)

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
<u><i>Class I</i></u>			
Benzene	23.4	23.4	0.00
Propylene Oxide	63.1	79.57	+ 16.47
<u><i>Class II</i></u>			
Ethyl Benzene	290.7	180.50	- 110.2
Glycol Ethers	18.77	19.77	+ 1.00
Styrene	162.99	56.27	- 106.72
Xylene (<i>mixed isomers</i>)	142.46	96.91	- 45.55
<u><i>Class III</i></u>			
n-Butyl Alcohol	66.45	18.96	- 47.49
Cumene	133.96	37.79	- 96.17
Ethylene Glycol	12.64	10.78	- 1.86
n-Hexane	150.32	18.96	- 131.36
Methanol	142.46	16.60	- 125.86
Methyl Ethyl Ketone	131.54	19.07	- 112.47
Methyl Isobutyl Ketone		14.84	+ 14.84
Toluene	290.7	36.89	- 253.81
Vinyl Acetate	290.7	17.27	- 273.43
<u><i>Supplemental List</i></u>			
Benzyl Chloride	0.00	45.50	+ 45.50
Dimethyl Formamide	22.62	19.56	- 3.06
Glycol Ethers	18.77	19.71	+ 0.94
Methyl Tert Butyl Ether	165.56	13.90	- 151.66

*The speciation lists the maximum emissions allowed for each TAP facility-wide.

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

Other VOC (TPY): 0 – 290.7

Other VOC emissions = 290.7 - VOC LAC 33:III Chapter 51 TAPs, therefore "Other" VOC emissions may vary anywhere from 0 to 290.7 TPY.

Worse case storage conditions were used to establish/determine the permitted emission rates. The potential to emit (PTE) from the tanks have been calculated for potential chemicals or petroleum products which could be stored in them. Calculations are based on a maximum throughput of 15 tank volumes per year, tank physical parameters, and physical properties of the individual chemicals. Internal floating roofs shall be used when required by the chemical stored. Calculations reflect this orientation. The permit provides flexibility for the facility to (1) store compounds according to a specific size storage tank; (2) store compounds by the number of storage tanks and (3) upgrade fixed roof storage tanks with add on controls, such as installation of an internal floater.

Emission calculations from loading operations of potential chemicals and petroleum products were based on limited throughputs (bbl) at maximum loading rates, in gpm. Physical properties of the individual chemicals and whether the loading operations required flare controlled or uncontrolled conditions were taken into account. The facility does not perform simultaneous loading of LAC 33:III Chapter 51 Table 51.1 TAPs, so as not to violate ambient air standards.

The sum of the facility-wide VOC emissions shall not exceed 290.7 TPY in any consecutive 12 month period. The individual TAP emissions listed in the Table above are greater than their minimum emission rates (MERs) and cannot exceed the TPY in the Tables. These limits were established such that the maximum proposed storage scenario meets the ambient air quality standard. In addition, MACT determinations have also been established.

Increases in VOC LAC 33:III Chapter 51 Toxic Air Pollutants are the result of previously unaccounted emissions. Decreases in emissions are a result of increasing the flexibility of storage authority and decreasing throughputs.

Regulatory Analysis

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III Chapter 51 and 40 CFR 63 Hazardous Air Pollutants (HAPs) with issuance of this permit. Benzene,

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

Ethyl benzene, Glycol ethers (Class II), Propylene oxide, Styrene, and Xylene are either Class I or Class II compounds that are above the respective minimum emission rate (MER), and therefore, sources of these emissions shall comply with all applicable provisions of the Louisiana Air Toxics Program, LAC 33:III:Chapter 51. In addition, the facility must meet the requirements for ambient air standards for these Class I and Class II compounds along with the following Class III TAPs, n-Butyl Alcohol, Cumene, Ethylene Glycol, n-Hexane, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Sulfuric Acid, Toluene, and Vinyl Acetate. (See Section VII. Ambient Air Standards).

Louisiana Air Quality Regulations and NSPS

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or Table 1 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit.

Prevention of Significant Deterioration Applicability

LBC is a major stationary source. PSD applies to any major stationary source or major modification to an existing major stationary source. PSD is applicable if new emission increases, from a physical modification or a change in the method of operations, exceed the PSD Significance Levels for regulated pollutants, listed in LAC 33:III.509.1.4.b. Emissions increases in this permit are due primarily to the documentation of speciated TAPs, which were not previously considered. Emissions are not due to a physical modification or change in the method of operation, therefore, a PSD permit is not applicable.

MACT requirements

LBC's Air Toxic Compliance Plan, CC92018, was approved on February 7, 1995. MACT determinations were made for storage tanks, marine and truck loading operations, and fugitive emissions. Sunshine Terminal is subject to all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 61, Subpart J-National Emission Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene, Subpart V-National Emission Standards for Equipment Leaks (Fugitive Emission Sources), and Subpart BB-National Emission Standards for Benzene Emissions from Benzene Transfer Operations. The requirements of NESHAP, 40 CFR 61, Subpart BB, shall also be met when loading propylene oxide.

Storage tanks, Emission Points 55-4, 55-5, 55-6, 55-7, 55-8, 55-9, 55-10, 55-11, 55-13, 80-6, 80-7, 80-8, and 80-9, shall comply with all applicable requirements of NESHAP, 40 CFR

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

61, Subpart Y-National Emission Standards for Benzene Emission from Benzene Storage Vessels, when storing benzene.

Storage tanks 10-1, 15-1, 25-1, 55-1, 55-2, 55-3, 80-1, 80-2, 150-1 and 150-2, shall comply with all applicable provisions of New Source Performance Standards (NSPS), 40 CFR 60, Subpart K-Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, when storing petroleum liquids.

Storage tanks 12-1, 12-2, 12-3, 12-4, 15-2, 25-2, 55-4, 55-5, 55-6, 55-7, 55-8, 55-9, 55-10, 55-11, 55-13, 80-3, 80-4, 80-5, 80-6, 80-7, 80-8, and 80-9, shall comply with all applicable provisions of NSPS, 40 CFR 60, Subpart Ka-Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, when storing petroleum liquids.

Storage tanks 150-1 and 150-2 shall meet the control requirements of NSPS, 40 CFR 60, Subpart Kb, when storing volatile organic liquids containing Class II toxic air pollutants with a vapor pressure greater than 1.5 psia. These two tanks shall not store Class I toxic air pollutants with a vapor pressure greater than 1.5 psia.

MACT for fugitive emissions is Louisiana MACT Determination for Non-HON (NON Hazardous Organic NESHAP) Equipment Leaks (Fugitive Emission Sources), promulgated March 30, 1995.

All other toxic air pollutants approved for storage at the terminal, and not listed in the Emissions Table above, are emitted, facility-wide, at levels below their minimum emission rate (MER). Therefore, MACT and/or AAQS are not required.

The facility shall comply with 40 CFR 63 Subpart EEEE according to the compliance date.

Air Modeling Analysis

Benzene, Ethyl Benzene and Toluene were modeled using Industrial Source Complex 2 Short Term (ISCST2) by CK Associates, documented December 1993 in LBC's Compliance Plan. The Compliance Plan states that the ambient air standards are not exceeded beyond the facility's fence line for Benzene, Ethyl benzene and Toluene. The Air Toxic Compliance Plan, No. CC92018, was approved on February 7, 1995.

LBC increased the throughputs of Benzene, Ethyl benzene, and Toluene, and expanded the list of liquid products to be handled on site, which included the following toxics above their respective MERs: n-Butyl Alcohol, Cumene, Ethylene glycol, Glycol ethers (Class II), n-

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

Hexane, Methanol, Methyl ethyl ketone, Methyl isobutyl ketone, Propylene oxide, Styrene, Vinyl acetate, and Xylene. Phoenix Engineering Inc., submitted air dispersion modeling results to LDEQ April 24, 1995 and May 3, 1995 for Benzene and Propylene oxide, respectively. Ambient Air Ranking was performed for benzene and propylene oxide, with AASs on an annual basis.

Modeling was not performed for any TAP with an AAS on an 8 hour basis; therefore, compliance was not demonstrated for those compounds. In February 2006, LBC demonstrated compliance for these other TAPs through the ambient air standards (AAS) ranking process. Sulfuric acid had the highest lb/year:AAS ratio and was modeled. The air modeling results demonstrated compliance of sulfuric acid, beyond the property line, with its AAQS. Therefore, all other TAPs on an 8-hour average AAS standard (n-Butyl alcohol, Cumene, Ethyl benzene, Ethylene glycol, Glycol ethers, n-Hexane, Methanol, Methyl ethyl ketone, Methyl isobutyl ketone, Styrene, Toluene, Vinyl acetate, and Xylene) are also in compliance with their respective AAS.

Dispersion Model(s) Used: Industrial Source Complex 2 Short Term (ISCST2) & ISCST3, Version 02035

Pollutant	Time Period	Calculated Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Louisiana Toxic Air Pollutant Ambient Air Quality Standard ($\mu\text{g}/\text{m}^3$)
Benzene ¹	Annual Average	7.42	12
Propylene Oxide ¹	Annual Average	26.167	27
Sulfuric Acid ²	8-Hour Average	13.2	23.8

¹ ISCST2 modeling results for Benzene and Propylene oxide were submitted to the Department dated April 24, 1995 and May 3, 1995, respectively.

² Modeling results for Sulfuric Acid using dispersion model ISCST3 Version 02035, February 2006.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

IV. PERMIT SHIELDS

A permit shield was not requested in the permit application or via the submittals of additional information.

V. PERIODIC MONITORING

Federal regulation 40 CFR 64 Compliance Assurance Monitoring (CAM) may be applicable to this facility. Applicability for each pollutant, requires that the unit be subject to an emission limitation or standard and must use a control device to achieve compliance. Exceedance of the emission limits shall be reported to the Office of Environmental Compliance, Enforcement Division in accordance with 40 CFR Part 70 General Condition R. If LBC's facility has CAM applicability, a CAM plan must be submitted to LDEQ Air Permits Division either at the first renewal of their Part 70 Operating Permit or during implementation of a major modification.

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
GRP009	Entire Facility	Prevention of Significant Deterioration of Air Quality [LAC 33:III.509 / 40 CFR 52.21]	DOES NOT APPLY. The emission increases requested in this application are less than the significance levels defined in LAC 33:III.509B. LBC Baton Rouge does not have any PSD permits.
		Gasoline Bulk Terminal [LAC 33:III.2135] Gasoline Terminal Vapor-Tight Control Procedure [LAC 33:III.2137]	DOES NOT APPLY. The facility is not a bulk gasoline terminal. The facility only has one storage tank for storage of gasoline which is used solely for fueling company owned vehicles and equipment.
		NSPS Subpart XX - Standards of Performance for Bulk Gasoline Terminals [40 CFR 60.500] Bulk gasoline terminal means any gasoline facility which receives gasoline by pipeline, ship or barge, and has a gasoline throughput greater than 20,000 gallons per day. [40 CFR 60.501]	DOES NOT APPLY. The facility is not a bulk gasoline terminal. The facility is not a bulk gasoline terminal. The facility only has one storage tank for storage of gasoline which is used solely for fueling company owned vehicles and equipment.
		National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) [40 CFR 63, Subpart R] Bulk gasoline terminal means any gasoline facility which receives gasoline by pipeline, ship or barge, and has a gasoline throughput greater than 20,000 gallons per day. [40 CFR 63.421]	DOES NOT APPLY. The facility is not a gasoline facility (bulk gasoline terminal or pipeline breakout station) because the facility does not handle gasoline in gasoline service. The facility handles gasoline blending stock, or additives which are mixed into gasoline. Gasoline means any fuel sold in any State for use in motor vehicles and motor vehicle engines, and commonly or commercially known or sold as gasoline. [40 CFR 80.2] Gasoline blending stock, blendstock, or component means any liquid compound which is blended with other liquid compounds to produce gasoline. [40 CFR 80.2]
		In gasoline service means that a piece of equipment is used in a system that transfers gasoline or gasoline vapors. [40 CFR 63.421]	DOES NOT APPLY. Boilers have a maximum heat input less than 250 MMBTU/hr. [40 CFR 60.40(a)]
EQT001 EQT013	1-80 & 2-80 - 700 HP Cleaver-Brooks Boiler	NSPS Subpart D - Standards of Performance for Fossil Fuel-Fired Steam Generators [40 CFR 60.40]	DOES NOT APPLY. No construction, modification, or reconstruction commenced after 6/19/84. [40 CFR 60.40(b)(a)]
		NSPS Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40(b)]	DOES NOT APPLY. No construction, modification, or reconstruction commenced after 6/9/89. [40 CFR 60.40c(a)]
		NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c]	DOES NOT APPLY. No construction, modification, or reconstruction commenced after 6/9/89. [40 CFR 60.40c(a)]

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PPER19960001
Draft Permit 1280-00025-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
EQT001 EQT013	1-80 & 2-80 - 700 HP Cleaver-Brooks Boiler	NESHAP Subpart DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters	DOES NOT APPLY. The boilers are large limited use gaseous fuel units, therefore only the initial notification requirements in 63.9(b) were required per 40 CFR 63.7506(b). (i.e. the boilers are not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of DDDDD.)
		Chapter 22. Control of Emissions of Nitrogen Oxides (NO _x)	EXEMPT. The boilers are back-up to each other with a maximum rated capacity of less than 40 MMBtu/hr.
EQT002 EQT003 EQT 042	Truck FL-1 Marine FL-2 Rail FL-3	Chapter 22. Control of Emissions of Nitrogen Oxides (NO _x)	EXEMPT. The flares control emissions of VOC for truck, marine, and railcar loading operations and vents at an above ground location.
EQT001 EQT013 EQT013 EQT002 EQT003 EQT 042	1-80 & 2-80 (700 HP Cleaver-Brooks Boilers)	Emission Standards for Sulfur Dioxide Emission Limitations [LAC 33:III.1503.C]	EXEMPT. Unit emits less than 250 tons of SO ₂ per year. Record and retain at the site for at least 2 years the data required to demonstrate compliance with or exemption from SO ₂ standards of Chapter 15. Compliance data shall be reported annually in accordance with LAC 33:III.19.18.
	Truck FL-1 Marine FL-2 Rail FL-3	Recordkeeping and Reporting [LAC 33:III.1513]	
EQT043	500GT - Gasoline Storage Tank	Subchapter F. Gasoline Handling - Filling of Gasoline Storage Vessels [LAC 33:III.2131]	EXEMPT. Any gasoline outlet in the parishes of Ascension, Calcasieu, East Baton Rouge, Iberville, Livingston, Pointe Coupee and West Baton Rouge whose throughput is less than 120,000 gallons (454,200 liters) per year are exempt from the requirements of LAC 33:III.2131.A. This storage tank is located in Iberville Parish with a throughput of less than 120,000 gallons per year, thus is exempt from LAC 33:III.2131.A.

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
EQT004	Tank 10-1	Chapter 21. Control of Emission of Organic Compounds Subchapter A. General 21:03. Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY/APPLIES. The fixed roof storage tanks store inorganic compounds, non-volatile organic compounds (non-VOCs), and volatile organic compounds (VOCs) that do not have a maximum true vapor pressure of 1.5 psia or greater. The tanks are not pressure tanks capable of maintaining working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere. Each tank is designed and equipped with a submerged fill pipe, but no tank currently has one or more of the vapor loss control devices described in Subsections C, D, and E of this Section. The storage tanks do not store organic compounds with a vapor pressure of 11.0 psia or greater.
EQT005	Tank 12-1	No person shall place, store, or hold in any stationary tank, reservoir, or other container of more than 40,000 gallons nominal capacity any volatile organic compound having a maximum true vapor pressure of 1.5 psia or greater at storage conditions unless such tank, reservoir, or other container is a pressure tank capable of maintaining working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere or is designed and equipped with a submerged fill pipe and one or more of the vapor loss control devices described in Subsections C, D, and E of this Section. If the organic compounds have a vapor pressure of 11.0 psia or greater under actual storage conditions, the requirements of Subsection F of this Section shall supersede the requirements of this Subsection.	However, the facility has the capability, via submission of a permit Administrative Amendment to LDEQ Environmental Services, Air Permits Division, to add emission controls in accordance with LAC 33:III.2103, which permits storage of VOCs having a maximum true vapor pressure of 1.5 psia but not greater than 11.0 psia.
EQT006	Tank 12-2		The facility has elected to control Methyl Isobutyl Ketone emissions by installing and internal floating roof in accordance with LAC 33:III.2103. This control measure ensures that MIBK's ambient air standards are not exceeded and reduces emissions of VOCs and hazardous air pollutants (HAPs) to remain at or below the facility wide VOC and HAPs CAP. The facility is required to submit an Administrative Amendment for storage of MIBK into tanks that are currently fixed roof.
EQT007	Tank 12-3		
EQT008	Tank 12-4		
EQT009	Tank 15-1		

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
EQT015	Tank 25-1	Chapter 21. Control of Emission of Organic Compounds Subchapter A. General 2103. Storage of Volatile Organic Compounds [LAC 33:III.2 03]	DOES NOT APPLY/APPLIES. The fixed roof storage tanks store inorganic compounds, non-volatile organic compounds (non-VOCs), and volatile organic compounds (VOCs) that do not have a maximum true vapor pressure of 1.5 psia or greater. The tanks are not pressure tanks capable of maintaining working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere. Each tank is designed and equipped with a submerged fill pipe, but no tank currently has one or more of the vapor loss control devices described in Subsections C, D, and E of this Section. The storage tanks do not store organic compounds with a vapor pressure of 11.0 psia or greater.
EQT016	Tank 25-2	No person shall place, store, or hold in any stationary tank, reservoir, or other container of more than 40,000 gallons nominal capacity any volatile organic compound having a maximum true vapor pressure of 1.5 psia or greater at storage conditions unless such tank, reservoir, or other container is a pressure tank capable of maintaining working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere or is designed and equipped with a submerged fill pipe and one or more of the vapor loss control devices described in Subsections C, D, and E of this Section. If the organic compounds have a vapor pressure of 11.0 psia or greater under actual storage conditions, the requirements of Subsection F of this Section shall supersede the requirements of this Subsection.	However, the facility has the capability, via submission of a permit Administrative Amendment to LDEQ Environmental Services, Air Permits Division, to add emission controls in accordance with LAC 33:III.2 03, which permits storage of VOCs having a maximum true vapor pressure of 1.5 psia but not greater than 11.0 psia.
EQT018	Tank 55-1		
EQT017	Tank 35-1		
EQT022	Tank 55-2		
EQT023	Tank 55-3		
EQT030	Tank 80-1		
EQT033	Tank 80-3		
EQT034	Tank 80-4		
EQT035	Tank 80-5		
EQT011	Tank 150-1F		
EQT012	Tank 150-2F		
EQT004	Tank 10-1	NSPS Subpart K – Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY/APPLIES. This fixed roof storage tanks do not store petroleum liquids with a true vapor pressure equal to or greater than 1.5 psia.
EQT009	Tank 15-1		However, the facility has the capability, via submission of a permit Administrative Amendment to LDEQ Environmental Services, Air Permits Division, to add emission controls in accordance with 40 CFR 60 Subpart K, which permits storage of petroleum liquids having a maximum true vapor pressure of 1.5 psia but not greater than 11.1 psia.
EQT015	Tank 25-1		
EQT018	Tank 55-1		
EQT022	Tank 55-2		
EQT023	Tank 55-3		
EQT030	Tank 80-1		

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
EQT004	Tank 10-1	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. The tanks vessels were not constructed, reconstructed or modified after May 18, 1978.
EQT009	Tank 15-1		
EQT015	Tank 25-1		
EQT018	Tank 55-1		
EQT022	Tank 55-2		
EQT023	Tank 55-3		
EQT030	Tank 80-1	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b])	DOES NOT APPLY. Storage tanks were not constructed, reconstructed or modified after July 23, 1984.
EQT005	Tank 12-1	NSPS Subpart K – Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. Storage tanks were not constructed, reconstructed or modified prior to May 19, 1978.
EQT006	Tank 12-2		
EQT007	Tank 12-3		
EQT008	Tank 12-4		
EQT016	Tank 25-2		
EQT033	Tank 80-3		
EQT034	Tank 80-4		
EQT035	Tank 80-5		

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
EQT005	Tank 12-1	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY/APPLIES. This fixed roof storage tanks do not store petroleum liquids with a true vapor pressure equal to or greater than 1.5 psia. However, the facility has the capability, via submission of a permit Administrative Amendment to LDEQ Environmental Services, Air Permits Division, to add emission controls in accordance with 40 CFR 60 Subpart Ka [60.114a], which permits storage of petroleum liquids having a maximum true vapor pressure of 1.5 psia but not greater than 11.1 psia.
EQT006	Tank 12-2	The owner or operator of each storage vessel to which this subpart applies which contains a petroleum liquid which, as stored, has a true vapor pressure equal to or greater than 1.5 psia but not greater than 11.1 psia shall equip the storage vessel with one of the following:	
EQT007	Tank 12-3	An external floating roof, a fixed roof with an internal floating type cover, a vapor recovery system, or a system equivalent to those described in paragraphs (a)(1), (a)(2), or (a)(3) of this section as provided in 60.114a.	
EQT008	Tank 12-4		
EQT016	Tank 25-2		
EQT033	Tank 80-3		
EQT034	Tank 80-4		
EQT035	Tank 80-5		
		NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage tanks were not reconstructed or modified after July 23, 1984.
EQT011	Tank 150-1F	NSPS Subpart K and Ka – Standards of Performance for Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 and After May 18, 1978, and Prior to July 23, 1984, respectively. [40 CFR 60.110/60.110a]	DOES NOT APPLY. Storage tanks were constructed prior to May 19, 1978, but were reconstructed or modified after July 23, 1984.
EQT012	Tank 150-2F		

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	A APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
EQT011	Tank 150-1F	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	EXEMPT/APPLIES. The fixed roof storage tanks do not store liquids with a maximum true vapor pressure equal to or greater than 0.75 psia. However, the facility has the capability, via submission of a permit Administrative Amendment to LDEQ Environmental Services, Air Permits Division, to add emission controls in accordance with 40 CFR 60 Subpart Kb [60.114b], which permits storage of liquids having a maximum true vapor pressure of 0.75 psia but not greater than 11.1 psia.
EQT012	Tank 150-2F	A storage vessel containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 0.75 psia but less than 11.1 psia shall equip each storage vessel with one of the following. A fixed roof in combination with an internal floating roof, an external floating roof, closed vent system and control device, or a system equivalent to those provided in 60.114b.	
EQT014	Tank 20-1	NSPS Subpart K and Ka – Standards of Performance for Petroleum Liquid Storage Vessels [40 CFR 60.110 and 40 CFR 60.110a]	DOES NOT APPLY. Storage tanks were constructed prior to June 11, 1973 and have not been reconstructed or modified. These tanks are grandfathered.
EQT017	Tank 35-1	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels [40 CFR 60.110b]	
EQT030	Tank 80-1	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III,Chapter 51]	DOES NOT APPLY. Storage tanks do not store toxic air pollutants above the MER.
EQT032	Tank 80-2		

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PPER19960001
Draft Permit 1280-00025-V0

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

EMISSION POINT ID	DESCRIPTION	APPLICABLE REQUIREMENT	COMPLIANCE METHOD/PROVISION
EQT004	Tank 10-1		APPLIES/DOES NOT APPLY. The storage tanks must comply with the reporting requirements according to LAC 33:III.5107.
EQT005	Tank 12-1		MACT, for storage of Class I and/or Class II toxic compounds is compliance with either LAC 33:III.2103 or 40 CFR 60 Subpart Kb. Ethyl Benzene, Glycol Ethers, Styrene, and Xylene have MACT applicability. However, these compounds have a vapor pressure less than 1.5 psia, and do not meet the vapor pressure requirements for applicability of LAC 33:III.2103 or 40 CFR 60 Subpart Kb. [S109.A]
EQT006	Tank 12-2		MACT is not required for storage of Class III toxic compounds and/or Supplemental toxic air pollutants (n-Butyl Alcohol, Cumene, Ethylene Glycol, n-Hexane, Methanol, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Sulfuric Acid, Toluene, Vinyl Acetate, Benzyl Chloride, Dimethyl Formamide, Glycol Ethers, Methyl Tert Butyl Ether). However, LAC 33:III.2103 applies to storage of those Class III compounds with a vapor pressure of 1.5 psia or greater (n-Hexane, MEK, Vinyl Acetate, MTBE). [S109.A]
EQT007	Tank 12-3		Tanks storing Class I, II, and/or III toxic compounds must comply with LAC 33:III.5109.B Ambient Air Standard Requirements. S109.B does not apply to Supplemental toxic air pollutants.
EQT008	Tank 12-4		
EQT009	Tank 15-1		
EQT010	Tank 15-2		
EQT011	Tank 150-1F		
EQT012	Tank 150-2F		
EQT014	Tank 20-1		
EQT015	Tank 25-1		
EQT016	Tank 25-2		
EQT017	Tank 35-1		
EQT018	Tank 55-1		
EQT022	Tank 55-2		
EQT023	Tank 55-3		
EQT033	Tank 80-3		
EQT034	Tank 80-4		
EQT035	Tank 80-5		

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

VI. STREAMLINED REQUIREMENTS

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
LBC	None		

Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Electric arc furnace means a vessel in which forms of iron and steel such as scrap and foundry returns are melted through resistance heating by an electric current flowing through the arcs formed between the electrodes and the surface of the metal and also flowing through the metal between the arc paths.

Electric induction furnace means a vessel in which forms of iron and steel such as scrap and foundry returns are melted though resistance heating by an electric current that is induced in the metal by passing an alternating current through a coil surrounding the metal charge or surrounding a pool of molten metal at the bottom of the vessel.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H₂S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Iron and steel foundry means a facility or portion of a facility that melts scrap, ingot, and/or other forms of iron and/or steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce. Research and development facilities and operations that only produce non-commercial castings are not included in this definition.

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Metal melting furnace means a cupola, electric arc furnace, or electric induction furnace that converts scrap, foundry returns, and/or other solid forms of iron and/or steel to a liquid state. This definition does not include a holding furnace, an argon oxygen decarburization vessel, or ladle that receives molten metal from a metal melting furnace, to which metal ingots or other material may be added to adjust the metal chemistry.

NESHAP - National Emission Standards for Hazardous Air Pollutants – Toxic air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

LBC BATON ROUGE, LLC
Initial Title V Permit
Sunshine, Iberville Parish, Louisiana
Agency Interest Number: 3492
Activity Number: PER19960001
Draft Permit 1280-00025-V0

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD)--A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

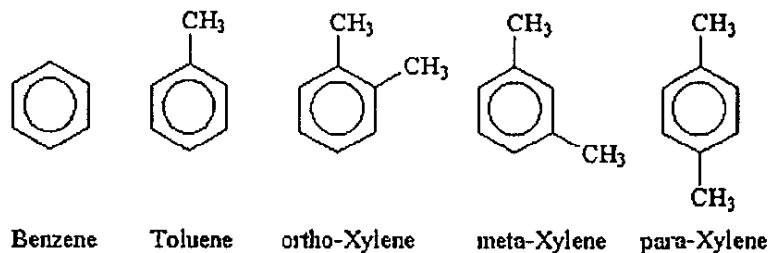
Sulfur Dioxide (SO₂) - An oxide of sulphur.

TAP - Toxic Air Pollutant (LDEQ acronym for air pollutants regulated under LAC 33 Part III, Chapter 51, Tables 1 through 3

Title V permit - See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.

Benzene, toluene, and xylene. These aromatic molecules are very important components of gasoline and petrochemicals. Benzene, the simplest aromatic, is carcinogenic and its level in gasoline is severely restricted. Toluene and xylene have benzene rings to which are attached one or two methyl (CH₃) groups, respectively; xylene has three isomers, with the methyls adjacent on the ring (*ortho*), separated by one carbon (*meta*), or separated by two carbons (*para*); see figure.



MTBE Methyl-t-butyl ether, an oxygen containing fuel component used in reformulated gasoline. Commonly made from methanol (methyl alcohol) and isobutene.